

# Technical Bulletin for N.C. General Stormwater Permits NCG030000 and NCG090000

Technical Bulletin for NCG030000 and NCG090000

Last Revised 10/25/2012

#### What is regulated by these two General Permits?

These two General Permits <u>regulate stormwater discharges</u> from two groups of industrial manufacturing activities:

- ✓ NCG030000 (NCG03) for metal fabrication and metal finishing businesses
- √ NCG090000 (NCG09) for the manufacture of paints, varnishes, and allied products

#### What does my permit require me to do?

- ✓ Develop and implement a written Stormwater Pollution Prevention Plan (SPPP) (Part II, Section A).
- ✓ Provide secondary containment for bulk storage of liquid materials (Part II, Section A).
- ✓ Conduct semi-annual self-monitoring of the pollutant content in stormwater discharges, and report the results to DWQ (Part II, Sections B and C).
- ✓ Conduct semi-annual visual inspections of stormwater pollutant sources, control measures, conveyances, and outfalls (Part II, Sections A and D).
- √ Respond to monitoring results that exceed the numerical benchmarks with management actions to reduce the level of pollutants in the stormwater discharges. The numerical benchmarks are considered as 'action levels.'

#### Why?

- ✓ The two General Permits seek to reduce industrial pollution in rainfall runoff from manufacturing businesses by requiring site managers to be aware of, and control, the potential for polluted runoff.
- ✓ Federal and state laws and regulations require the control of industrial pollution in stormwater runoff.
- √ Those laws and regulations reflect the public's support for providing for clean natural waters in our state and nation.

### What has changed since the last renewals in 2007?

#### Common changes to both General Permits:

- The required content of the SPPP has been expanded slightly and clarified in minor ways in several paragraphs.
- The permittee may now sample discharges from any *measureable* storm event, rather than from a *representative* event. This change should make it easier to obtain a sample from a qualifying rain event.
- The permit text now clarifies that failure to sample due to adverse weather, or due to no discharge during the normal monitoring period, may be excused. However, the permits now require additional monthly monitoring for unexcused failures to monitor.
- Vehicle Maintenance Areas (VMA) shall be monitored for Total Petroleum Hydrocarbons (TPH) rather than Oil & Grease (O&G).
- VMA monitoring is now triggered by the total oil usage for motor oil *plus hydraulic oil*. The trigger remains at a total of 55 gallons per month, average.
- A lower TSS benchmark of 50 mg/L applies for discharges to especially protected water classifications.

#### Significant changes specific to the different General Permits

- For NCG03: Analytical monitoring for copper and zinc have been added to allow more facilities to qualify for coverage under this General Permit.
- <u>For NCG09</u>: Monitoring results must be reported in mg/L rather than ug/L; monitoring results may not be reported as 'non-detect', or 'below detection limit', or other similar notations, but instead must indicate the numerical value of the reporting or detection limit of the test procedure employed.

### **Frequently Asked Questions**

#### Do I have to monitor all outfalls?

Yes. However, you may request ROS (Representative Outfall Status). If ROS is approved, this status allows analytical monitoring at fewer outfalls. To request ROS, submit a ROS Request Form SWUROS (from our website) to the DWQ Regional Office.

### What if I can't collect a stormwater discharge in 30 minutes?

When distances separate multiple outfalls and preclude collection within 30 minutes of each discharge event, begin collection within 30 minutes and then continue until all outfalls are sampled. Documentation must be kept in the SPPP.

# Can I take more samples than is required by my permit?

Yes. The permittee may take multiple samples at any time while under permit coverage. The permittee may find the extra sampling useful to quickly identify causes of benchmark exceedances. All sampling for the permit parameters must be reported to DWQ on the DMR forms.

### What if I can't sample because of bad weather?

Adverse weather is dangerous or it may limit access for sampling personnel. Your documentation of adverse weather and the reasons for not sampling must be included in your SPPP. A substitute sample may be taken during the next qualifying storm event.

## What if I don't address visual monitoring problems?

If you do not respond to problems seen in visual monitoring, DWQ may require that you increase the visual monitoring frequency, apply for an individual permit, implement in-stream monitoring, install or modify structural stormwater controls, or implement other controls.

#### What if I forget to monitor?

DWQ may require monthly monitoring for a specified time period.

### Why did you replace Oil & Grease with TPH in VM areas?

The TPH test only targets chemicals derived from crude oil. The Oil & Grease (O&G) test recovers fats from animal & vegetable sources and chemicals from crude oil. Because TPH is more specific, it is a better parameter for vehicle maintenance areas. The TPH method we are specifying is EPA 1664A (SGT-HEM). It is important to note that DWQ is **not** specifying the more expensive Gas Chromatograph (GC) TPH method. DWQ found lab costs for EPA 1664A (SGT-HEM) to be comparable to O&G test costs. To test these parameters in stormwater, labs must perform this test in accordance with EPA procedures, but do not need to be certified. Note: A lower benchmark applies for TPH: 15 mg/l (not 30 mg/l).

### Why are there two benchmark values for TSS?

The 100 mg/L benchmark applies to most rivers, lakes, and creeks in North Carolina. However, some other waters must receive special protection under North Carolina water quality rules, and in these two permits discharges to them are subject to the more protective benchmark of 50 mg/L. Those waters classified as Trout Waters, High Quality Waters, Outstanding Resource Waters, and Primary Nursery Areas receive this extra protection in these permits.

## Where and when do I send the monitoring reports?

See your permit text, Part III, Section E.

### Who can help me?



Division of Water Quality (DWQ) Offices:

	( )
Asheville Office	(828) 296-4500
Fayetteville Office	(910) 433-3300
Mooresville Office	(704) 663-1699
Raleigh Office	(919) 791-4200

# Must I use a North Carolina certified laboratory?

No. North Carolina water quality rules do not require that analyses of stormwater be accomplished by a certified facility. *Please note however, federal rules at 40CFR136 do require that testing for these two permits be by EPA-approved lab methods.* Analysis by a North Carolina certified lab is often the easiest way to insure compliance with federal rules.

Note that pH is a special case, and must be measured within 15 minutes of the sample recovery. You must either train on-site staff to conduct pH testing, or contract with commercial services to test pH in accordance with EPA field testing methods.

### Must a P. E. sign and stamp my SPPP?

No. North Carolina water quality rules do not require that the SPPP be the work product of a North Carolina P.E.

#### Who inspects me, and for what?

Staff from the DWQ Regional Offices shown below will inspect your facility. They will typically ask to see your SPPP and will check to see if it is complete and up to date. They will typically ask to see your recent monitoring results. They will typically tour the facility with a focus on the stormwater discharge outfalls and on your general housekeeping as a way to assess the potential for polluted stormwater discharges. Our staff will always follow up their Compliance Evaluation Inspection with a summary letter to you, restating their findings and, if necessary indicating whether enforcement action will be considered in response to those findings.

Washington Office	(252) 946-6481
Wilmington Office	(910) 796-7215
Winston-Salem Office	(336) 771-5000
Central Office	(919) 807-6300

DWQ Stormwater Permitting Unit: http://portal.ncdenr.org/web/wq/ws/su